

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ADAPTIVE SPECTRUM AND SIGNAL
ALIGNMENT, INC.,

Plaintiff,

v.

AT&T ENTERPRISES, LLC, AT&T
MOBILITY LLC, AT&T MOBILITY II
LLC AND AT&T SERVICES INC.

Defendants.

Civil Action No.: 2:24-cv-00029-JRG-RSP

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION AND PRE-HEARING STATEMENT

Pursuant to Local Patent Rule 4-3, Plaintiff Adaptive Spectrum and Signal Alignment, Inc. and Defendants AT&T Enterprises, LLC, AT&T Mobility LLC, AT&T Mobility II LLC, and AT&T Services Inc. hereby file this Joint Claim Construction and Prehearing Statement for the above-captioned matter. A Markman hearing for this matter is currently proposed on March 19, 2025.

1. AGREED TERMS (P.R. 4-3(a)(1))

The parties have agreed to the following constructions:

Term	Agreed Construction
“coupled to” (’122 patent claims 14 and 20)	a connection between two elements and/or components either directly together, or indirectly, for example via one or more intervening elements or via a wireless connection, where appropriate

2. DISPUTED TERMS (P.R. 4-3(a)(2))

The parties have set forth their proposed constructions in three exhibits: **Exhibit A** sets forth the parties' proposed constructions for each disputed term. **Exhibit B** sets forth ASSIA's proposed constructions of each disputed claim term and an identification of all references from the specification or prosecution history that support that position, and an identification of any extrinsic evidence known to the party on which it intends to rely either to support its position or to oppose any other party's position, including, but not limited to, as permitted by law, dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses. **Exhibit C** sets forth AT&T's proposed constructions of each disputed claim term and an identification of all references from the specification or prosecution history that support that position, and an identification of any extrinsic evidence known to the party on which it intends to rely either to support its position or to oppose any other party's position, including, but not limited to, as permitted by law, dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses.

3. LENGTH OF TIME NECESSARY FOR THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(a)(3))

The parties anticipate that 3 hours will be necessary for the claim construction hearing.

4. WITNESSES, INCLUDING EXPERTS, AT THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(a)(4))

Neither party proposes to call one or more witnesses at the hearing.

5. ADDITIONAL ISSUES (P.R. 4-3(a)(5)).

The parties are not aware of any other issues that might be appropriately taken up at a prehearing conference prior to the Claim Construction Hearing.

DATED: December 19, 2024

/s/ Justin Nemunaitis

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Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on December 19, 2024. Local Rule CV-5(a)(3)(A).

/s/ Justin Nemunaitis

Justin T. Nemunaitis